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for Northshore Asset Management, LLC, Ardent  
Research Partners L.P., Ardent Research Partners  
Ltd., and Saldutti Capital Management, L.P.*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION, :  
Plaintiff, :  
Civil Action No.  
-against- :  
05-CV-2192 (WHP)  
NORTHSORE ASSET MANAGEMENT, LLC, et al., :  
Defendants. :  
ARTHUR STEINBERG, as Receiver for :  
Northshore Asset Management, LLC, et al., :  
Plaintiff, :  
Civil Action No.  
-against- :  
06-CV-5024 (WHP)  
UNIVERSAL GENESIS STRATEGIC :  
HOLDINGS, INC. et al., :  
X

Defendants. :  
----- X  
----- X  
ARTHUR STEINBERG, as Receiver for :  
Northshore Asset Management, LLC, et al., :  
Plaintiff, :  
-against- : Civil Action No.  
LEO SPHIZ, : 06-CV-5564 (WHP)  
Defendant. :  
----- X  
----- X  
ARTHUR STEINBERG, as Receiver for :  
Northshore Asset Management, LLC, et al., :  
Plaintiff, :  
-against- : Civil Action No.  
RICHARD WHARTON, : 06-CV-5565 (WHP)  
Defendant. :  
----- X  
----- X  
ARTHUR STEINBERG, as Receiver for :  
Northshore Asset Management, LLC, et al., :  
Plaintiff, :  
-against- : Civil Action No.  
JIM PORTER, : 06-CV-5566 (WHP)  
Defendant. :  
----- X

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ARTHUR STEINBERG, as Receiver for :  
Northshore Asset Management, LLC, et al., :  
Plaintiff, :  
-against- : Civil Action No.  
MELVIN NEWMAN, : 06-CV-5567 (WHP)  
Defendant. :  
----- X  
ARTHUR STEINBERG, as Receiver for :  
Northshore Asset Management, LLC, et al., :  
Plaintiff, :  
-against- : Civil Action No.  
WALTER SCHWAB, : 06-CV-7770 (WHP)  
Defendant. :  
----- X  
ARTHUR STEINBERG, as Receiver for :  
Northshore Asset Management, LLC, et al., :  
Plaintiff, :  
-against- : Civil Action No.  
GLENN SHERMAN, et al., : 07-CV-1001 (WHP)  
Defendants. :  
----- X

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ARTHUR STEINBERG, as Receiver for :  
Northshore Asset Management, LLC, et al., :  
Plaintiff, :  
-against- : Civil Action No.  
BLOOMBERG, L.P. et al., : 07-CV-1208 (WHP)  
Defendants. :  
----- X  
ARTHUR STEINBERG, as Receiver for :  
Northshore Asset Management, LLC, et al., :  
Plaintiff, :  
-against- : Civil Action No.  
BOMBARDIER TRUST (CANADA) et al., : 07-CV-1212 (WHP)  
Defendants. :  
----- X  
ARTHUR STEINBERG, as Receiver for :  
Northshore Asset Management, LLC, et al., :  
Plaintiff, :  
-against- : Civil Action No.  
FONDATION J. ARMAND BOMBARDIER, : 07-CV-1217 (WHP)  
Defendant. :  
----- X

ARTHUR STEINBERG, as Receiver for  
Northshore Asset Management, LLC, et al., : X  
Plaintiff, :  
-against- : Civil Action No.  
JOEL ASH, : 07-CV-4832 (WHP)  
Defendant. :  
ARTHUR STEINBERG, as Receiver for  
Northshore Asset Management, LLC, et al., : X  
Plaintiff, :  
-against- : Civil Action No.  
STEPHEN A. ALDERMAN, : 07-CV-4833 (WHP)  
Defendant. : X

**NOTICE OF MOTION OF ARTHUR STEINBERG, RECEIVER FOR  
NORTHSIDE ASSET MANAGEMENT, LLC, ET AL., FOR AN ORDER  
REQUIRING REIMBURSEMENT AND AN ACCOUNTING**

**PLEASE TAKE NOTICE** that, upon the annexed motion (“Motion”) of Arthur Steinberg, the court-appointed receiver (“Receiver”) for Northshore Asset Management, LLC, *et al.*, by and through his counsel, the Receiver shall move before the Honorable William H. Pauley III, United States District Court Judge for the Southern District of New York (“Court”), at a date and time to be set by the Court, in the United States Courthouse, Southern District of New York, United States District Court, 500 Pearl Street, New York, New York 10007 for an order (“Order”) requiring (a) payment to the Clerk of the Court for deposit into an interest-bearing account with the Court Registry Investment System (which will act as reimbursement to the

escrow account (“Escrow Account”)) of an amount to be determined but in no event less than \$378,658.35, plus interest that would have been earned on the money had it remained in the Escrow Account; and (b) an accounting, certified under penalty of perjury by both Francis Saldutti (“Saldutti”) and Julian Friedman, Esq. (“Friedman”), and the production of back-up records regarding all of the requests made for disbursements to Saldutti, the depositor, the distributions made by Stillman & Friedman, P.C. (“Stillman & Friedman”),<sup>1</sup> the escrow agent, and the expenditures of those funds by Saldutti, both for legal and non-legal items, so that the

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<sup>1</sup> The Stillman & Friedman firm is now known as Stillman, Friedman & Schectman, P.C., but, to be consistent with the Escrow Agreement, this Motion will refer to the firm as “Stillman & Friedman.”

Receiver can determine the amount of funds in addition to the \$378,658.35 which should be paid to the Clerk of the Court for deposit into an interest-bearing account with the Court Registry Investment System (which will act as reimbursement to the Escrow Account); and for such other and further relief as is just and proper.

Dated: New York, New York  
May 5, 2008

KAYE SCHOLER LLP

By:/s/ Paul J. Curran  
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